

FILED

FEB 27 2020

UNITED STATES BANKRUPTCY COURT
SAN FRANCISCO, CA

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SAN FRANCISCO, CA

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Claimant

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION

-and-

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

X Affects both Debtors

* All papers shall be filed in the Lead Case,
No. 19-30088(DM).

Bankruptcy Case No. 19-30088 (DM)
Chapter 11

(Lead Case)
(Jointly Administered)

**NOTICE OF MOTION FOR LEAVE TO
APPEAL ORDER DENYING MOTION
FOR RECONSIDERATION OF THE
ORDER PURSUANT TO 11 U.S.C. §§
363(b) AND 105(a) AND FED. R. BANKR.
P. 6004 AND 9019 (I) AUTHORIZING
THE DEBTORS AND TCC TO ENTER
INTO RESTRUCTURING SUPPORT
AGREEMENT WITH THE TCC,
CONSENTING FIRE CLAIMANT
PROFESSIONALS, AND
SHAREHOLDER PROONENTS, AND
(II) GRANTING RELATED RELIEF**

Date: TBD
Time: TBD
Judge: TBD

Objection Deadline: March 12, 2020

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NOTICE OF MOTION FOR LEAVE TO APPEAL ORDER DENYING MOTION FOR RECONSIDERATION
OF THE ORDER PURSUANT TO 11 U.S.C. §§ 363(b) AND 105(a) AND FED. R. BANKR. P. 6004 AND 9019
(I) AUTHORIZING THE DEBTORS AND TCC TO ENTER INTO RESTRUCTURING SUPPORT
AGREEMENT WITH THE TCC, CONSENTING FIRE CLAIMANT PROFESSIONALS, AND
SHAREHOLDER PROONENTS, AND (II) GRANTING RELATED RELIEF

1 **PLEASE TAKE NOTICE** that on January 29, 2019, PG&E Corporation and Pacific Gas and
2 Electric Company, as debtors and debtors in possession (collectively, the “Debtors”), in the above-
3 captioned chapter 11 cases, each filed a voluntary petition for relief under chapter 11 of title 11 of
4 the United States Code with the United States Bankruptcy Court for the Northern District of
5 California (San Francisco Division) (the “Bankruptcy Court”).

6 **PLEASE TAKE FURTHER NOTICE** that, pursuant to 28 U.S.C. § 158(a)(3) and Federal Rule
7 of Bankruptcy Procedure 8004, William B Abrams (“Mr. Abrams”) has filed the *Motion for Leave*
8 *to Appeal Order Denying Motion for Reconsideration of the Order Pursuant to 11 U.S.C. §§*
9 *363(b) AND 105(a) and FED. R. BANKR. P. 6004 and 9019 (I) Authorizing the Debtors and TCC*
10 *to Enter into Restructuring Support Agreement with the TCC, Consenting Fire Claimant*
11 *Professionals, and Shareholder Proponents, and (II) Granting Related Relief* (the “Motion”).

12 The Motion accompanies Mr. Abram’s *Notice of Appeal and Statement of Election to Have*
13 *Appeal Heard by District Court* (the “Notice of Appeal”) and is supported by the *Memorandum in*
14 *Support of Motion for Leave to Appeal Order Denying Motion for Reconsideration of the Order*
15 *Pursuant to 11 U.S.C. §§ 363(b) and 105(a) AND FED. R. BANKR. P. 6004 and 9019 (I)*
16 *Authorizing the Debtors and TCC to Enter into Restructuring Support Agreement with the TCC,*
17 *Consenting Fire Claimant Professionals, and Shareholder Proponents, and (II) Granting Related*
18 *Relief*, this notice of the Motion, and all the papers and record on file in this action.

19 **PLEASE TAKE FURTHER NOTICE** that the Motion may be heard by the United States District
20 Court of the Northern District of California (the “District Court”) at a date and time to be set by the
21 District Court. Pursuant to Federal Rule of Bankruptcy Procedure 8004(c)(3), however, any relief
22 requested in the Motion may be granted without a hearing.

23 **PLEASE TAKE FURTHER NOTICE** that, pursuant to Federal Bankruptcy Rule of Procedure
24 8004(b)(2), any oppositions or responses to the Motion must be in writing, filed with the District
25 Court, and served on counsel for the Trade Committee so as to be received by no later than **March**
26 **12, 2020**. Any oppositions or responses must also be filed and served on all the parties reflected in
27 the Notice of Appeal.

1 **PLEASE TAKE FURTHER NOTICE** that copies of the Motion and its supporting papers can be
2 viewed and/or obtained: (i) by accessing the Bankruptcy Court's website at
3 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden
4 Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors' notice and claims agent, Prime
5 Clerk LLC, at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for
6 U.S.-based parties; or +1 (929) 333-8977 for international parties or by email at:
7 pgeinfo@primeclerk.com. Note that a PACER password is needed to access documents on the
8 Bankruptcy Court's website.

9 DATED: February 27, 2020

10 Respectfully submitted,

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13 William B. Abrams
14 Claimant

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NOTICE OF MOTION FOR LEAVE TO APPEAL ORDER DENYING MOTION FOR RECONSIDERATION
OF THE ORDER PURSUANT TO 11 U.S.C. §§ 363(b) AND 105(a) AND FED. R. BANKR. P. 6004 AND 9019
(I) AUTHORIZING THE DEBTORS AND TCC TO ENTER INTO RESTRUCTURING SUPPORT
AGREEMENT WITH THE TCC, CONSENTING FIRE CLAIMANT PROFESSIONALS, AND